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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(**HONORABLE JANIS L. SANMARTINO**)

UNITED STATES OF AMERICA,)	CASE NO. 08CR0212-JLS
)	
Plaintiff,)	DATE: March 7, 2008
)	TIME: 1:30 p.m.
v.)	
)	NOTICE OF MOTIONS AND
)	MOTIONS:
JUAN JOSE AGUIRRE-CRUZ,)	
)	(1) TO COMPEL SPECIFIC
Defendant.)	DISCOVERY; AND,
)	(2) FOR LEAVE TO FILE
)	FURTHER MOTIONS
)	

TO: KAREN HEWITT, UNITED STATES ATTORNEY, AND
PAUL STARITA, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on March 7, 2008, at 1:30 p.m. or as soon thereafter as counsel may be heard, the defendant, Juan Aguirre, by and through his counsel, Stephen D. Demik and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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08CR0212-JLS

MOTIONS

The defendant, Juan Aguirre, by and through his attorneys, StephenD. Demik and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order:

- 1) To Compel Discovery; And,
- 2) For Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

Dated: February 22, 2008

STEPHEN D. DEMIK
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Aguirre

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

1 UNITED STATES OF AMERICA,)

2 Plaintiff,)

Case No. 08cr0212-JLS

3 v.)

CERTIFICATE OF SERVICE

4 JUAN JOSE AGUIRRE-CRUZ,)

5 Defendant.)

6 _____)
7 Counsel for Defendant certifies that the foregoing pleading, is true and accurate
8 to the best of her information and belief, and that a copy of the foregoing has been
9 electronically served this day upon:

10
11 **Paul L Starita**

Paul.Starita@usdoj.gov,efile.dkt.gc1@usdoj.gov

12 mailed to: Mr. Aguirre
13 Defendant

14 Dated: February 22, 2008

/s/ Stephen D. Demik

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